

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

JOSHUA MELLO and RACHEL WARE,  
*Plaintiffs,*

vs.

DEREK GUSTAFSON, TIMOTHY VESEY,  
STEVEN CATALANO, JOHN ROCCHIO and  
EDWARD ARRUDA  
*Defendants*

C.A. No. 1:23-cv-00480-JJM-PAS  
1:23-cv-00479-JJM-PAS

**DEFENDANTS' MOTION TO EXTEND PRETRIAL DEADLINES**

Now come the Defendants, Edward Arruda (“Defendant Arruda”) and John Rocchio (“Defendant Rocchio”)(collectively hereinafter “Defendants”) and move for an extension of all pre-trial dates. Currently, factual discovery closes on July 10, 2024. Defendants request that factual discovery be extended ninety (90) days until October 8, 2024, and that all other pre-trial dates be extended in conformity with the factual discovery date extension. The state as a reason that, although the parties are in the process of discovery, there remain depositions to be completed and possible discovery motions. The extra time is necessary to complete the discovery responses that Plaintiffs served upon Defendants on June 20, 2024, to conduct the depositions, and to address any subsequent discovery that arises.

**WHEREFORE,** Defendants respectfully request that the pre-trial dates be extended. Specifically, it is requested that that Factual Discovery be extended to October 8, 2024; Plaintiff’s Expert Disclosure be extended to November 8, 2024, Defendants’ Expert Disclosure be extended to December 9, 2024, Expert Disclosures be extended to January 8, 2025, and Dispositive Motions be extended to February 10, 2025.

Defendants

*Mello, et al, v. Derek Gustafson, et al*  
*C.A. No. 23-cv-000480-JJM-LDA*

Defendants, John Rocchio and  
Edward Arruda  
By their Attorney,

/s/ Marc DeSisto

Marc DeSisto (#2757)

/s/ Julia K. Scott- Benevides

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#### CERTIFICATION

I hereby certify that the within document has been electronically filed with the Court on the 9<sup>th</sup> day of July, 2024, and is available for viewing and downloading from the ECF system.

I further certify that a true and accurate copy of the within was emailed and mailed, postage prepaid, to:

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/s/ Julia K. Scott- Benevides